

## REMARKS

This amendment is being filed along with an RCE in response to the final rejection mailed February 16, 2006. Applicants are enclosing a one month extension of time. Please charge the fees for the RCE, the extension of time, and the two additional independent claims in this amendment as well as any additional fees, to Baker Hughes Deposit Account 02-0429. Applicants certainly appreciate the allowance of claims 9-12. Applicants also appreciate the indication of allowance of claims 2, 4-8 and 14-16 if amended to become independent, incorporating the requirements of the parent claims and any intervening claims. Applicants have accordingly amended claims 2 and 14 to become independent. Applicants have amended a number of the other claims to better define the invention. Applicants respectfully traverse the rejection of the remaining claims over Huntsinger and respectfully request reconsideration.

Claim 1 as amended requires a capsule that is installed through an open first end of a primary housing and lands in the primary housing, the primary housing having a receptacle of smaller diameter on a second end. The claim requires that the capsule have an inlet that sealingly engages the receptacle as the capsule lands for receiving well fluid flowing through the intake conduit into the receptacle and the inlet of the capsule. Applicants respectfully submit that this requirement cannot be read on Huntsinger. Even if one assumed that casing hanger 24 could be considered a primary housing, casing 11 a receptacle, and tubing 200 a capsule, there still is no inlet to tubing 200 that sealingly engages casing 11 as tubing 200 lands. Rather, the only sealing engagement of tubing 200 appears to be at the upper end where tubing 302 lands on a seat 303 in casing hanger 24, considered by the examiner to be the primary housing. The upper end of tubing 200 is not the inlet to the capsule, rather it is the outlet. Column 8, lines 64 to the

end of the specification do not mention any type of sealing engagement of tubing 200 with a receptacle at the lower end of casing 11.

The embodiment of Figure 1b shows a pump seat 15 that would provide sealing engagement between the tail pipe 110 of pump assembly 10 and casing 11. However, there is no suggestion that such an arrangement could be used for tubing 200 when pump 10 is located inside the tubing 200 as in the embodiment of Figure 6. The Figure 1b embodiment does not employ tubing, rather ESP 10 is suspended on a cable 52 within casing 11.

Claim 3 depends from claim 1, requiring that the inlet of the capsule comprise a tailpipe that stabs sealingly into the receptacle as the capsule lands in the primary housing. Tubing 200 of Figure 6 embodiment of Huntsinger does not have a tailpipe stabbing sealingly into any receptacle in casing 11. The well fluid in casing 11 would be free to flow into the annulus surrounding tubing 200 to whatever level the internal formation pressure would place it.

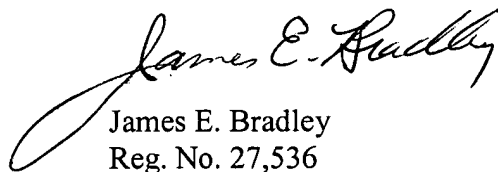
New claim 19 requires that the sealing engagement of the inlet of the capsule with the receptacle prevent the entry of well fluid into the primary housing. As shown in Figure 2 of this application, tailpipe 47 sealingly engages the receptacle, requiring all of the fluid to flow into capsule 53. None of the fluid would be able to flow into primary housing 29 in the annulus surrounding capsule 45. In Huntsinger in the Figure 6 embodiment, there is no seal suggested between the lower end of tubing 200 and casing 11, thus well fluid would be free to flow into casing 11 and around at least a portion of the exterior of tubing 200. The advantage of preventing well fluid from contacting the exterior of capsule 45 is that when lifted into the sea for retrieval, it will not have residue of well fluid or oil on its exterior. Tubing 200 of Huntsinger would have well fluid or oil on its exterior when pulled from casing 11.

Claim 13 requires installing a primary housing at the sea floor at a location remote from a producing well. The claim requires flowing well fluid from the producing well into the receptacle, through the inlet and into the capsule and pumping the well fluid from the capsule with the pump assembly. Huntsinger deals with an arrangement for pumping well fluid from a producing well wherein the tubing and casing are located in the producing well. Huntsinger does not suggest a primary housing installed remote from the producing well.

Claim 17 depends from claim 13, specifying that the sealing engagement of the inlet of the capsule with receptacle prevents the entry of well fluid into the primary housing. As discussed above in connection with claim 18, this requirement is not met in Huntsinger. There is no sealing engagement between the perforations in tubing 200 and the perforations 13 in casing 11. Rather, the well fluid is free to flow from perforations 13 around at least the lower portion of the tubing. The embodiment in Figure 1b does not show an ESP located within tubing, rather it is suspended on cable 52 within casing 11.

It is respectfully submitted that the claims are now in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,



James E. Bradley  
Reg. No. 27,536  
Attorney for Applicants

Date: June 12, 2006  
BRACEWELL & GIULIANI LLP  
P. O. Box 61389  
Houston, Texas 77208 1389  
Tel: (713) 221-3301  
Fax: (713) 222-3287